

**STATE OF SOUTH CAROLINA**  
**BEFORE THE PUBLIC SERVICE COMMISSION**  
**DOCKET NO. 2019-290-WS**

IN RE:	)	
	)	
APPLICATION OF BLUE GRANITE	)	<b>CONSUMER ADVOCATE'S FIRST</b>
WATER COMPANY FOR APPROVAL	)	<b>REQUEST FOR PRODUCTION TO</b>
TO ADJUST THE RATE SCHEDULE	)	<b>BLUE GRANITE WATER COMPANY</b>
AND INCREASE RATES	)	
	)	

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Pursuant to S.C. Code Ann. Regs. 103-833(C), the Consumer Advocate, by and through its undersigned counsel, hereby submits this First Request for Production to Blue Granite Water Company. Pursuant to South Carolina Rule of Civil Procedure 26(e), each request is continuing until the time of the hearing such that Blue Granite Water Company must promptly transmit to the Consumer Advocate the requested information as it becomes available. Please forward to the undersigned, via email, your first iteration of responses to the following request on or before Tuesday, February 11, 2020:

- 1-1 Please provide the curriculum vitae or resume showing all qualifications, employment history, previous witness experience, and publications of all witnesses whom Blue Granite Water Company intends to use as a witness at the hearing in this case. Pursuant to South Carolina Rule of Civil Procedure 26(e), this interrogatory is continuing until the time of the hearing such that Blue Granite Water Company must promptly transmit to the Consumer Advocate the requested information as it becomes available.
- 1-2 Please provide detailed work papers—in original MS Excel format with intact formulas and links—supporting the modifications, disallowances, or adjustments identified in response to Interrogatory 1-2. Pursuant to South Carolina Rule of Civil Procedure 26(e), this interrogatory is continuing until the time of the hearing such that Blue Granite Water

Company must promptly transmit to the Consumer Advocate the requested information as it becomes available.

- 1-3 Please provide any documents, records, or other information in any form referred to or relied upon in any of Blue Granite Water Company's responses to the Consumer Advocate's First Set of Interrogatories. Pursuant to South Carolina Rule of Civil Procedure 26(e), this interrogatory is continuing until the time of the hearing such that Blue Granite Water Company must promptly transmit to the Consumer Advocate the requested information as it becomes available.
- 1-4 Please provide detailed work papers and Excel files-with intact formulas and links identified in response to Interrogatory 1-6 (a.).
- 1-5 Please provide detailed work papers and Excel files-with intact formulas and links identified in response to Interrogatory 1-9 (a.).
- 1-6 Please provide a proof of revenues by customer class for water and sewer service showing current and proposed rates, billing determinants, and revenues.
- 1-7 Please provide a three-year monthly history for the most recent period available in Excel format of each of the following:
- a. Number of water customers by class;
  - b. Billed water consumption by class;
  - c. Number of sewer customers by class; and
  - d. Total SFEs by class for sewer customers.

SIGNATURE ON NEXT PAGE

Consumer Advocate

By: s/L. Becky Dover

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January 22, 2020  
Columbia, South Carolina